



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 22 2005

REPLY TO THE ATTENTION OF
(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dennis Mullin
Plant Manager
Greif Brothers Corporation
4300 W. 130th Street
Alsip, Illinois 60803

Re: Finding of Violation
Greif Brothers Corporation
Alsip, Illinois

Dear Mr. Mullin:

The United States Environmental Protection Agency (U.S. EPA) is issuing the enclosed Finding of Violation (FOV) to Greif Brothers Corporation (you). We find that you are violating the Maximum Achievable Control Technology (MACT) for industrial process cooling towers at 40 C.F.R. Part 63, Subpart Q.

We have several enforcement options under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the FOV.

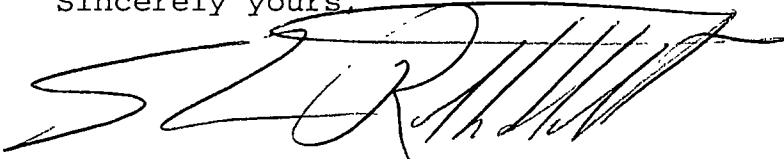
We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

In addition to the violations alleged in the FOV, we also would like to discuss your use of hexavalent chromium at the comfort cooling tower, which may be a violation of 40 C.F.R. § 749.68(e)(2).

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The U.S. EPA contact in this matter is Kathryn Siegel. You may call her at (312) 353-1377 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'S. Rothblatt', with a large, sweeping flourish extending to the left.

Stephen Rothblatt, Director
Air and Radiation Division

Enclosure

cc: Julie Armitage, Acting Manager
Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)	
)	
Greif Brothers Corporation)	FINDING OF VIOLATION
Alsip, Illinois)	
)	EPA-5-06-04-IL
)	
Proceedings Pursuant to)	
the Clean Air Act,)	
42 U.S.C. §§ 7401 <u>et seq.</u>)	
_____)	

FINDING OF VIOLATION

The United States Environmental Protection Agency finds that Greif Brothers Corporation is violating the Maximum Achievable Control Technology (MACT) for industrial process cooling towers at 40 C.F.R. Part 63, Subpart Q as follows:

Statutory and Regulatory Authority

Maximum Achievable Control Technology

1. 40 C.F.R. Part 63, Subpart Q applies to industrial process cooling towers.
2. 40 C.F.R. § 63.400(a) applies to all new and existing industrial process cooling towers that are operated with chromium-based water treatment chemicals on or after September 8, 1994, and are either major sources or are integral parts of facilities that are major sources as defined in § 63.401.
3. 40 C.F.R. § 63.401 defines "industrial process cooling tower", also written as "IPCT", as any cooling tower that is used to remove heat that is produced as an output of a chemical or industrial process(es), as well as any cooling tower that cools industrial processes in combination with any heating, ventilation, or air conditioning system.
4. 40 C.F.R. § 63.401 defines "chromium-based water treatment chemicals" as any combination of chemical substances containing chromium used to treat water.

5. 40 C.F.R. § 63.401 defines "major source" as any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant (HAP) or 25 tons per year or more of any combination of HAPs.
6. 40 C.F.R. § 63.402 states that no owner or operator of an industrial process cooling tower shall use chromium-based water treatment chemicals in any affected industrial process cooling tower.
7. 40 C.F.R. § 63.403(a) states that for existing industrial process cooling towers, the compliance date shall be 18 months after September 8, 1994.

Greif Brothers Corporation's Facility

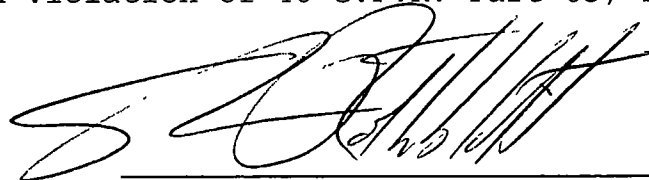
8. Greif Brothers Corporation owns and operates a metal drums production plant at 4300 W. 130th Street, Alsip, Illinois. The plant operates two industrial process cooling towers that were constructed prior to 1994.
9. Greif Brothers Corporation purchased corrosion inhibitors for the two industrial process cooling towers from H-O-H Chemicals, Incorporated. The material safety data sheets for these corrosion inhibitors listed sodium chromate and sodium dichromate, which are chromium-based water treatment chemicals.
10. The plant is a major source of hazardous air pollutants because it has a potential to emit of 10 tons per year or more of a single HAP or 25 tons per year or more of any combination of HAPs.

Violations

11. Greif Brothers Corporation used chromium-based water treatment chemicals in its industrial process cooling towers, which is in violation of 40 C.F.R. Part 63, Subpart Q.

Date

11/22/2005



Stephen Rothblatt, Director
Air and Radiation Division

CERTIFICATE OF MAILING


I, Betty Williams, certify that I sent a Finding of Violation, No. EPA-5-06-04-IL, by Certified Mail, Return Receipt Requested, to:

Mr. Dennis Mullin, Plant Manager
Greif Brothers Corporation
4300 W. 130th Street
Alsip, IL 60803

I also certify that I sent copies of the Finding of Violation by first class mail to:

Julie Armitage, Acting Manager
Compliance and Enforcement Section, Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

on the 23rd day of November, 2005.


Betty Williams, Secretary
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0005 8909 7728